Mr. Scott Frankowski Anchor Glass Container Corporation 603 East North Street Winchester, IN 47394

Re: 135-11351

First Significant Permit Modification to Part 70 No.: T 135-6042-00012

Dear Mr. Frankowski:

Anchor Glass Container Corporation was issued a permit on June 24, 1999 for a glass container manufacturing operation. A letter requesting changes to this permit was received on September 17, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes in the compliance monitoring provisions due to changes in fuel usage and corrections regarding control equipment.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nisha Sizemore, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Nisha Sizemore or extension 2-8356, or dial (317) 232-8356.

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Management

#### Attachments

nls

cc: File - Randolph County

U.S. EPA, Region V

Randolph County Health Department

Air Compliance Section Inspector - Warren Greiling

Compliance Data Section - Karen Nowak

Administrative and Development - Janet Mobley

Technical Support and Modeling - Michele Boner

# PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

# Anchor Glass Container Corporation 603 East North Street Winchester, Indiana 47394

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T135-6042-00012	
Issued by: Janet McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 24, 1999
First Significant Permit Modification: T135-11351-00012	Pages Affected: all
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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#### **Compliance Determination Requirements**

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# Certification

Emergency/Deviation Occurrence Report

**Quarterly Compliance Monitoring Report** 

Anchor Glass Container Corporation Winchester, Indiana

Permit Reviewer: Nisha Sizemore

First Significant Permit Modification 135-11351 Modified by: Nisha Sizemore Page 6 of 53 OP No. T135-6042-00012

#### **SECTION A**

#### **SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

#### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary glass container manufacturing operation.

Responsible Official: Gary Jarrett, General Manager

Source Address: 603 East North Street, Winchester, Indiana 47394
Mailing Address: 603 East North Street, Winchester, Indiana 47394

SIC Code: 3221 County Location: Randolph

County Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program

Major Source, under PSD Rules

# A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) natural gas-fired glass Furnace, identified as Furnace #1, constructed in 1971, with a maximum design melt capacity of 344 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST7;
- one (1) natural gas-fired glass Furnace, identified as Furnace #2, constructed in 1973, with a maximum design melt capacity of 448 tons of glass per day and a maximum qualified pull rate of 390 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST8;
- one (1) natural gas-fired Brownwell Boiler, constructed in 1908, identified as Boiler #1, rated at 100 hp, with a maximum heat input capacity of 10.5 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST1;
- one (1) natural gas-fired Buss Boiler, constructed in 1940, identified as Boiler #2, rated at 250 hp, with a maximum heat input capacity of 16.8 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST2;
- one (1) raw materials batch storage and conveying process, constructed in 1929, with a maximum capacity of 1200 tons per day, with emissions uncontrolled and exhausting inside the building;
- (6) one (1) raw materials batch mixing process, constructed in 1929, with a maximum capacity of 1200 tons per day, with emissions controlled by baghouse BH1 which exhausts to stack ST9 and baghouse BH2 which exhausts inside the building;

Anchor Glass Container Corporation Winchester, Indiana Permit Reviewer: Nisha Sizemore First Significant Permit Modification 135-11351 Modified by: Nisha Sizemore Page 7 of 53 OP No. T135-6042-00012

- (7) one (1) glass Furnace day bin, servicing Furnace #1, constructed in 1940, with a maximum capacity of 550 tons per day, controlled by a baghouse BH3 and emissions exhausting to stack ST5; and
- (8) one (1) glass Furnace day bin, servicing Furnace #2, constructed in 1991, with a maximum capacity of 650 tons per day, controlled by baghouse BH4 and emissions exhausting to stack ST6.

# A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) cullet crushing operations;
- (2) one (1) cardboard baler;
- (3) mold swabbing operations, including multiple forming machines;
- (4) hot end treatment operations, including multiple coating hoods;
- (5) four (4) parts washing stations used for maintenance purposes; and
- (6) mold shop operations.

#### A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

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#### **SECTION B**

#### **GENERAL CONDITIONS**

#### B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Condition B.14 entitled "Permit Shield."

#### B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

#### B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

#### B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

#### B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

#### B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

#### B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

#### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that

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IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

#### B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

#### B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

#### B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

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United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification:
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision;
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

# B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions:
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015

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#### Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM, .

#### B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered:

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,

Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

Anchor Glass Container Corporation Winchester, Indiana Permit Reviewer: Nisha Sizemore First Significant Permit Modification 135-11351 Modified by: Nisha Sizemore Page 12 of 53 OP No. T135-6042-00012

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

#### B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

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- (1) The applicable requirements are included and specifically identified in this permit; or
- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

#### B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

# B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Condition B.13 - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

# B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as

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expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

#### B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
  - (2) If IDEM, OAM, , upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3] If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, , takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, , any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)] If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

# B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

  The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:
  - (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
  - (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

#### B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act:
  - (2) Any approval required by 326 IAC 2-1 has been obtained;

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- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
  The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

  The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

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(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

#### B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

#### B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit:
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

# B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11] Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a

Anchor Glass Container Corporation Winchester, Indiana Permit Reviewer: Nisha Sizemore First Significant Permit Modification 135-11351 Modified by: Nisha Sizemore Page 19 of 53 OP No. T135-6042-00012

written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

#### B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

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#### **SECTION C**

#### **SOURCE OPERATION CONDITIONS**

#### Entire Source

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

#### C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

#### C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

# C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

# C.8 Stack Height [326 IAC 1-7]

(a) The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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# C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
  The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4
  and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are
  mandatory for any removal or disturbance of RACM greater than three (3) linear feet on
  pipes or three (3) square feet on any other facility components or a total of at least 0.75
  cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
  The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator,
  prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to
  thoroughly inspect the affected portion of the facility for the presence of asbestos. The
  requirement that the inspector be accredited is federally enforceable.

#### C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

#### C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

#### C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

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in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

#### C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

#### C.15 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent  $(\pm 2\%)$  of full scale reading.

#### Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

# C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 3, 1996.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.

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[326 IAC 1-5-3]

#### C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

# C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition:
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Condition C.18 (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM, . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

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- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]
  - (a) When the results of a stack test performed in conformance with Condition C.10 Performance Testing, of this permit exceed the level specified in any condition of this
    permit, the Permittee shall take appropriate corrective actions. The Permittee shall
    submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of
    receipt of the test results. The Permittee shall take appropriate action to minimize
    emissions from the affected facility while the corrective actions are being implemented.
    IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions
    taken are deficient. The Permittee shall submit a description of additional corrective
    actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency.
    IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant
    stack tests.
  - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
  - (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
    - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
    - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
  - (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

#### C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Condition C.10-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

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(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

#### C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- Records of required monitoring information shall include, where applicable: (b)
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - The operating conditions existing at the time of sampling or (6) measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Condition C.18 -Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Condition B.16 Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Stratospheric Ozone Protection**

#### C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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#### **SECTION D.1**

#### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) natural gas-fired glass Furnace, identified as Furnace #1, constructed in 1971, with a maximum design melt capacity of 344 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST7

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from the glass Furnace shall not exceed 27.2 pounds per hour.

This limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

#### D.1.2 Arsenic [40 CFR Part 61.160, Subpart N)

Pursuant to 40 CFR Parts 61.160, Subpart N (National Emission Standards For Inorganic Arsenic Emissions From Glass Manufacturing Plants) arsenic shall not be used as a raw material in Furnace #1. Therefore, the requirements of this rule shall not apply.

### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

#### **Compliance Determination Requirements**

#### D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

#### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the Furnace stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

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- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

# Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.6 Record Keeping Requirements [326 IAC 7-2-1 (Sulfur Dioxide Compliance)]
  - (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the Furnace stack exhaust.
  - (b) All records shall be maintained in accordance with Condition C.22 General Record Keeping Requirements, of this permit.

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#### SECTION D.2

#### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) natural gas-fired glass Furnace, identified as Furnace #2, constructed in 1973, with a maximum design melt capacity of 448 tons of glass per day and a maximum qualified melt capacity of 390 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST8

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM), Sulfur Dioxide (SO2), and Nitrogen Oxides (NOx) [326 IAC 2-2]

- (a) Pursuant to A 135-5897 issued on May 28, 1996, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable, the particulate matter emissions from the regenerative Furnace Number 2 shall not exceed 19.06 pounds per hour. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (b) Pursuant to A 135-5897 issued on May 28, 1996, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable, the sulfur dioxide (SO<sub>2</sub>) emissions from the regenerative Furnace Number 2 shall not exceed 83.6 pounds per hour.
- (c) Pursuant to A 135-5897 issued on May 28, 1996, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable, the nitrogen oxide (NOx) emissions from the regenerative Furnace Number 2 shall not exceed 116.6 pounds per hour.
- (d) Pursuant to A 135-5897 issued on May 28, 1996, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable, the pull rate of the Furnace Number 2 shall not exceed 390 tons per day.

These limits are necessary in order to render the requirements of PSD not applicable.

#### D.2.2 Arsenic [40 CFR Part 61.160, Subpart N)

Pursuant to 40 CFR Parts 61.160, Subpart N (National Emission Standards For Inorganic Arsenic Emissions From Glass Manufacturing Plants) arsenic shall not be used as a raw material in Furnace #2. Therefore, the requirements of this rule shall not apply.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

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#### **Compliance Determination Requirements**

#### D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM, SO<sub>2</sub>, and NOx testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.2.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

# Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the Furnace stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

# Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.2.6 Record Keeping Requirements [326 IAC 7-2-1 (Sulfur Dioxide Compliance)]

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the Furnace stack exhaust.
- (b) To document compliance with Condition D.2.1(d), the Permittee shall maintain records of the pull rate of Furnace #2 each day of operation.
- (c) All records shall be maintained in accordance with Condition C.22 General Record Keeping Requirements, of this permit.

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#### **SECTION D.3**

#### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) natural gas-fired Brownwell Boiler, constructed in 1908, identified as Boiler #1, rated at 100 hp, with a maximum heat input capacity of 10.5 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST1

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 10.5 MMBtu per hour heat input Boiler shall be limited to 0.8 pound per million Btu of heat input.

This limitation is based on the following equation:

Pt = 
$$\frac{\text{C X a X h}}{76.5 \text{ X Q}^{0.75} \text{ X N}^{0.25}}$$

- where C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.
  - Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).
  - Q = Total source maximum operating capacity rating in million Btu per hour of heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.
  - N = Number of stacks in fuel burning operation.
  - a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.
  - h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emissions rate.

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# **Compliance Determination Requirements**

# D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limits specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

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#### **SECTION D.4**

#### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) natural gas-fired Buss Boiler, constructed in 1940, identified as Boiler #2, rated at 250 hp, with a maximum heat input capacity of 16.8 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST2

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 16.8 MMBtu per hour heat input Boiler shall be limited to 0.8 pound per million Btu of heat input.

This limitation is based on the following equation:

Pt = 
$$\frac{\text{C X a X h}}{76.5 \text{ X Q}^{0.75} \text{ X N}^{0.25}}$$

- where C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.
  - Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).
  - Q = Total source maximum operating capacity rating in million Btu per hour of heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.
  - N = Number of stacks in fuel burning operation.
  - a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.
  - h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emissions rate.

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### **Compliance Determination Requirements**

### D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

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### **SECTION D.5**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] Boiler #3 has been decommissioned.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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### **SECTION D.6**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) raw materials batch storage and conveying process, constructed in 1929, with a maximum capacity of 1200 tons per day, with emissions uncontrolled and exhausting inside the building

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.6.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from the raw materials batch storage and conveying process shall not exceed 44.6 pounds per hour when operating at the maximum capacity of 50 tons per hour.

This limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight greater than sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55 (P^{0.11}) - 40$$
 where  $E =$ rate of emission in pounds per hour; and  $P =$ process weight rate in tons per hour

### D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

### **Compliance Determination Requirements**

### D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

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### **SECTION D.7**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) raw materials batch mixing process, with a maximum capacity of 1200 tons per day, constructed in 1929, with emissions controlled by baghouse BH1 which exhausts to stack ST9 and baghouse BH2 which exhausts inside the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.7.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from the raw materials batch mixing process shall not exceed 44.6 pounds per hour when operating at the maximum capacity of 50 tons per hour.

This limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight greater than sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55 (P^{0.11}) - 40$$
 where  $E =$ rate of emission in pounds per hour; and  $P =$ process weight rate in tons per hour

### D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for the raw materials batch mixing process.

### **Compliance Determination Requirements**

### D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

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### **SECTION D.8**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]

- (a) one (1) glass Furnace day bin, servicing Furnace #1, constructed in 1940, with a maximum capacity of 550 tons per day, with emissions controlled by baghouse BH3 and emissions exhausting to stack ST5; and
- (b) one (1) glass Furnace day bin, servicing Furnace #2, constructed in 1991, with a maximum capacity of 650 tons per day, with emissions controlled by baghouse BH4 and emissions exhausting to stack ST6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.8.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from each of the glass Furnace day bins shall not exceed 33.4 pounds per hour when operating at the maximum capacity of 22.9 tons per hour.

This limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

### **Compliance Determination Requirements**

### D.8.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limits specified in Condition D.8.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

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### **SECTION D.9**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] cullet crushing operations

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.9.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the cullet crushing process shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

### **Compliance Determination Requirements**

### D.9.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.9.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

### D.9.3 Visible Emissions [326 IAC 2-7-6(1)]

In the absence of stack test data, compliance with condition D.9.1 will be determined based on opacity from the cullet crushing process.

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### **SECTION D.10**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) cardboard baler

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.10.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the cardboard baling process shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

### **Compliance Determination Requirements**

### D.10.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.10.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

### D.10.3 Visible Emissions [326 IAC 2-7-6(1)]

In the absence of stack test data, compliance with condition D.10.1 will be determined based on opacity from the cardboard baling process.

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### **SECTION D.11**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) mold swabbing operation, including multiple forming machines

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.11.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the mold swabbing process shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ 

where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

### **Compliance Determination Requirements**

### D.11.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.11.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

### D.11.3 Visible Emissions [326 IAC 2-7-6(1)]

In the absence of stack test data, compliance with condition D.11.1 will be determined based on opacity from the mold swabbing operation which exhausts to the Robertson ventilator.

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### **SECTION D.12**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) hot end treatment operations, including multiple coating hoods

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.12.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the hot end treatment process shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ 

where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

### **Compliance Determination Requirements**

### D.12.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.12.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

### D.12.3 Visible Emissions [326 IAC 2-7-6(1)]

In the absence of stack test data, compliance with condition D.12.1 will be determined based on opacity from the hot end treatment operations which exhausts to the Robertson ventilator.

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### **SECTION D.13**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] all parts washers used for maintenance purposes, which were constructed after January 1, 1980.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.13.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

### D.13.2 Hazardous Air Pollutants (HAPs)

Pursuant to the 40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning, Subpart T, the solvent used in the parts washers shall not contain any of the following halogenated solvents in concentrations greater than five percent by weight: methylene chloride, 1,1,1-trichloroethane, trichloroethylene, perchloroethylene, carbon tetrachloride, or chloroform.

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### **SECTION D.14**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] Mold shop operations

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.14.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the mold shop operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

### **Compliance Determination Requirements**

### D.14.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.14.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

### D.14.3 Visible Emissions [326 IAC 2-7-6(1)]

In the absence of stack test data, compliance with condition D.14.1 will be determined based on opacity from the mold shop operations.

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

# PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Anchor Glass Container Corporation

Source Address: 603 East North Street, Winchester, Indiana 47394
Mailing Address: 603 East North Street, Winchester, Indiana 47394-0406

Part 70 Permit No.: T 135-6042-00012

Part	70 Permit No 1 135-0042-00012		
	This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.		
	Please check what document is being certified:		
9	Annual Compliance Certification Letter		
9	Test Result (specify)		
9	Report (specify)		
9	Notification (specify)		
9	Other (specify)		
	ertify that, based on information and belief formed after reasonable inquiry, the statements and ormation in the document are true, accurate, and complete.		
Sig	nature:		
Printed Name:			
Titl	Title/Position:		
Da	te:		

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION P.O. Box 6015 100 North Senate Avenue Indianapolis, Indiana 46206-6015 Phone: 317-233-5674

## PART 70 OPERATING PERMIT EMERGENCY/DEVIATION OCCURRENCE REPORT

Fax: 317-233-5967

Source Name: Anchor Glass Container Corporation

Source Address: 603 East North Street, Winchester, Indiana 47394
Mailing Address: 603 East North Street, Winchester, Indiana 47394-0406

Part 70 Permit No.: T 135-6042-00012

h	is	form	cons	ists	of 2	pages

Page 1 of 2

Check either No. 1 or No.2

- 9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
  - The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
  - C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:	
Control Equipment:	
Permit Condition or Operation Limitation in Permit:	
Description of the Emergency/Deviation:	
Describe the cause of the Emergency/Deviation:	

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Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:
Form Completed by: Title / Position: Date: Phone:

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# OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

# PART 70 OPERATING PERMIT QUARTERLY COMPLIANCE MONITORING REPORT

		er Corporation Winchester, Indiana 47394 Winchester, Indiana 47394-04	406
Мо	onths: to	Year:	
This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".			
9 NO DEVIATIONS	OCCURRED THIS REPO	DRTING PERIOD	
<b>9</b> THE FOLLOWING	DEVIATIONS OCCURR	ED THIS REPORTING PERI	OD.
	toring Requirement Condition D.1.3)	Number of Deviations	Date of each Deviation
		rtification to complete this rep	port.

# Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit

Source Name: Anchor Glass Container Corporation

Source Location: 603 East North Street, Winchester, Indiana 47394

County: Randolph SIC Code: 3221

Operation Permit No.: T 135-6042-00012
Operation Permit Issuance Date: June 24, 1999
Permit Modification No.: T 135-11351-00012
Permit Reviewer: Nisha Sizemore

On October 15, 1999, the Office of Air Management (OAM) had a notice published in the News Gazette, Winchester, Indiana, stating that Anchor Glass Container Corporation had applied for a significant permit modification to a Part 70 Operating Permit consisting of changes in the compliance monitoring provisions due to changes in fuel usage and corrections regarding control equipment. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 19, 1999, Anchor Glass Container Corporation submitted comments on the proposed significant permit modification to the Part 70 permit. The summary of the comments is as follows:

### **Section A: Source Summary**

### Comment #1

<u>A.6</u> – Baghouse BH1 which controls the raw materials batch mixing process actually exhausts to stack ST9 and not stack ST4.

### Response #1

This correction has been made in Section A.2(6) and Section D.7 of the permit.

one (1) raw materials batch mixing process, constructed in 1929, with a maximum capacity of 1200 tons per day, with emissions controlled by baghouse BH1 which exhausts to stack ST4 ST9 and baghouse BH2 which exhausts inside the building;

### SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] one (1) raw materials batch mixing process, with a maximum capacity of 1200 tons per day, constructed in 1929, with emissions controlled by baghouse BH1 which exhausts to stack ST4 ST9 and baghouse BH2 which exhausts inside the building.

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### **Section D: Facility Operation Conditions**

### Comment #2

<u>D.1.3</u> – A Preventive maintenance Plan (PMP) has been required for glass furnace #1. The regulatory purpose of the PMP is to ensure that the lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit. The allowable particulate matter (PM) emission limit for this particular furnace is 27.2 lbs/hr per requirement D.1.1. The *maximum potential* PM emissions from this furnace are only 20.1 lbs/hr even taking into consideration the fact that there is no control device associated with this furnace. Therefore, there is no possible way that the allowable PM emission limit can ever be exceeded. Since there are no other federal or state applicable requirements for this furnace, we believe that the PMP requirement is completely unjustified and without legal merit.

Furthermore, the items required in the PMP as described in section B.12 revolve around the use of pollution control devices which are necessary to ensure that the corresponding emission units comply with the applicable emission limitations. To reiterate, glass furnace #1 at this facility does not have (or need) a pollution control device to comply with its applicable PM emission limitation. This means that there is no pollution control device to inspect, maintain, or repair, and no replacement parts to keep in inventory. Therefore, we request that this PMP requirement be deleted from the permit.

<u>D.2.3</u> – The requirement for a PMP for glass furnace #2 is also unjustified based upon the same arguments as given above for section D.1.3. The allowable particulate matter (PM) emission limit for this particular furnace is 19.06 lbs/hr per the PSD requirement in section D.2.1. The *maximum potential* PM emissions from this furnace are only 16.25 lbs/hr even taking into consideration the fact that there is no control device associated with this furnace. There is no possible way that the allowable PM emission limit can ever be exceeded. Therefore, we request that this PMP requirement be deleted from the permit.

### Response #2

The maximum potential emissions cited by the applicant are based on operating the emission unit properly and with proper and timely maintenance. These are not the maximum emissions possible under any circumstances. Just because the maximum potential emissions are lower than the allowable emissions does not mean that it is impossible to have a violation. The maximum potential to emit from the furnace was based on proper operation.

The OAM believes that it is necessary to require PMPs for both of the glass furnaces in order to minimize emissions. The PMPs should include the repair and maintenance of the burners, fans, checkers, and exhaust systems, to properly check and repair all potential problem areas. The PMP for furnace #1 should also include the repair and maintenance of the electric boost. Also see response to comment #11. There have been no changes to the permit as a result of this comment.

### Comment #3

<u>D.1.5</u> - Visible emission (VE) notations for the glass furnace #1 exhaust stack have been required once per shift during normal daylight operations. This compliance monitoring requirement is excessive when compared to similar glass furnaces at Ball-Foster Glass Container in Marion, Indiana and Owens-Brockway Glass Container in Lapel, Indiana. Furthermore, it is our understanding that the requirement for regular VE notations was derived from the Title V Air Permit Compliance Monitoring *Guidance* document dated May 23, 1996. After reviewing page 21 of this document in detail, it is clear that VE notations were only intended to provide regulated facilities with an approved method of obtaining a quick and simple correlation to actual emissions from individual sources. In other words, if a facility were to observe "abnormal" visible emissions coming from a control device exhaust stack, then that would be a good indication that the control device is not operating properly and that corrective action should be taken in a timely manner to ensure that an applicable emission limit is not exceeded. This is not an issue for glass furnace #1 since there is no control device and since this emission unit cannot possibly

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exceed its allowable PM emission limitation.

To require VE notations once per shift to simply show compliance with the generic 40% opacity regulation is certainly excessive and unjustified. The glass furnaces at this facility are not significant sources of PM emissions. In fact, the latest PM compliance stack test on this glass furnace (October 1991) revealed that the actual PM emission factor for this furnace was only 0.5 lbs/ton as compared to the AP-42 emission factor of 1.4 lbs/ton (which was used in the Title V permit application as a conservative estimate). The process of melting glass in this furnace is relatively straight-forward and consistent. There is not a wide fluctuation in the quantity or quality of raw materials being charged into the furnace. IDEM air inspectors have never cited this facility for exceeding the allowable opacity level, and complaints from neighbors regarding excess smoke from this facility have been non-existent. Therefore, we request that the requirement to perform VE notations once per shift be deleted from this permit.

<u>D.2.5</u> - The requirement for VE notations on the glass furnace #2 exhaust stack is also unjustified based upon the same arguments as given above for section D.1.5. Therefore, we request that this monitoring requirement be deleted from the permit.

### Response #3

VE notations are not only required for controlled emission units. The visible emission notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6-3-2 (Process Operations), without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. The OAM does not believe that performing visible emissions notations once per operating shift is excessive, burdensome, or overly time-consuming. If, as implied in the comment, only "normal" visible emissions are ever observed, then time will not need to be spent implementing corrective actions. If abnormal visible emissions are observed, the source has the opportunity to implement corrective action such that an opacity violation can be avoided. There have been no changes to the permit as a result of this comment.

### Comment #4

 $\overline{\text{D.2.4}}$  – Compliance stack testing has been requested for glass furnace #2 in order to document compliance with the PSD emission limitations in section D.2.1. However, since this glass furnace's capacity to use fuel oil as an alternative fuel has been eliminated and it is only possible to utilize natural gas, SO<sub>2</sub> emissions are no longer a concern.

### Response #4

 $SO_2$  emissions from glass furnaces are generated mainly from the oxidation of sulfur-containing materials used in the glass batch mix such as salt cake, gypsum, and slag. A very small amount is retained in the glass product as  $SO_3$  and the rest is emitted as  $SO_2$ , sulfuric acid, and sulfates. Therefore, even though the glass furnace will no longer have the capacity to burn fuel oil, it will still be necessary to stack test the furnace for  $SO_2$  emissions to show compliance with the  $SO_2$  limit in the permit. There have been no changes to the permit as a result of this comment.

### Comment #5

<u>D.6.2</u> - The requirement for a PMP for the raw materials batch storage and conveying process is also unjustified based upon the same arguments as given above for section D.1.3. The allowable particulate matter (PM) emission limit for this process is 44.6 lbs/hr per requirement D.6.1. The *maximum potential* PM emissions from the batch storage and conveying process are only 15.9 lbs/hr even taking into consideration the fact that there is no control device associated with this process. There is no possible way that the allowable PM emission limit can ever be exceeded. In addition, the PM emissions from this process do not even discharge directly to atmosphere, which makes the PMP requirement completely unjustified since there is absolutely no negative effect on the environment. Therefore, we

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request that this PMP requirement be deleted from the permit.

### Response #5

The maximum potential emissions cited by the applicant are based on operating the emission unit properly and with proper and timely maintenance. These are not the maximum emissions possible under any circumstances.

If left without proper maintenance, conveyors can shake excessively, causing excess particulate emissions. The PMP for the raw materials batch storage and conveying process should include proper preventive maintenance for the conveyors. Also see response to comment #11. There have been no changes to the permit as a result of this comment.

### Comment #6

<u>D.7.2</u> – A PMP has also been required for the raw materials batch mixing process. The allowable PM emission limit for this particular process is 44.6 lbs/hr per requirement D.7.1. The *maximum potential* PM emissions from the batch mixing process are only 15.9 lbs/hr without taking into consideration the 98% efficient control devices associated with this mixing process (the PM emissions are only 0.32 lbs/hr when factoring in the control device efficiency). This means that this process could comply with the applicable PM emission limitation defined by 326 IAC 6-3 without the use of its two associated control devices (one of which discharges inside the plant anyway). Since there is no possible way that the allowable PM emission limit can ever be exceeded for this process, there is no need for a PMP to ensure that the associated control devices are working properly. In fact, this facility could decide to physically remove these control devices and still be in full compliance with all IDEM regulations. Therefore, we request that this PMP requirement be removed from the permit.

<u>D.7.4</u> – The requirement that the two baghouses (BH1 and BH2) on the batch mixing process be in operation at all times to comply with the 44.6 lbs/hr PM emission limitation is unnecessary and unjustified as described above for section D.7.2. Therefore, we request that this requirement be removed from the permit.

### Response #6

The OAM agrees that calculations show that the baghouses are not needed to comply with the applicable requirements. Therefore, the requirements to operate the baghouses, and the compliance monitoring requirements for the baghouses have been removed from the permit. The requirement to have a preventive maintenance plan has not been removed from the permit because it is necessary to do preventive maintenance on the mixer itself even though a control device is not necessary to maintain compliance with the rules.

### **Compliance Determination Requirements**

### D.7.32 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

### D.7.4 Baghouse [326 IAC 2-7-6(1)]

The baghouses BH1 and BH2 shall be in operation at all times in order to comply with the limit in condition D.7.1.

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### D.7.5 Visible Emissions Notations

- (a) Visible emission notations of the baghouses BH1 and BH2 stack exhausts shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### D.7.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the raw materials batch mixing process when venting to the atmosphere. All defective bags shall be replaced.

### D.7.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated processes will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

### D.7.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses BH1 and BH2 used in conjunction with the raw materials batch mixing process, at least once daily when the raw materials batch mixing process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST4 and ST9 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.10 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

### D.7.9 Record Keeping Requirements

(a) To document compliance with Conditions D.7.5 and D.7.8, the Permittee shall maintain records of daily visible emission notations of the raw materials batch mixing process stack

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exhaust and of the pressure drop across the baghouses BH1 and BH2.

- (b) To document compliance with Condition D.7.6, the Permittee shall maintain records of the results of the inspections required under Condition D.7.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Condition C.22 General Record Keeping Requirements, of this permit.

### Comment #7

<u>D.7.5</u> - The requirement for VE notations on the batch mixing process baghouse exhaust stack is also unjustified based upon the same arguments as given above for section D.1.5. Furthermore, BH2 discharges inside the plant, which means that this exhaust has no detrimental effect on the environment whatsoever. Let us reiterate that this process could operate without either of the two control devices in operation and still be in full compliance with all applicable IDEM regulations. Therefore, we request that this monitoring requirement be deleted from the permit.

 $\underline{\text{D.7.6}}$  – These requirements for the two baghouses controlling the batch mixing process are unnecessary and unjustified as described above for section D.7.5. Therefore, we request that these compliance monitoring requirements be deleted from the permit.

### Response #7

The OAM agrees that calculations show that the baghouses are not needed to comply with the applicable requirements. Therefore, the requirements to operate the baghouses, the requirement to have a PMP, and the compliance monitoring requirements for the baghouses have been removed from the permit.

### Comment #8

<u>D.8.2</u> - A PMP has also been required for the two glass furnace day bins. The allowable PM emission limit for the glass furnace #1 day bin is 33.4 lbs/hr per requirement D.8.1. Please note that the allowable PM emission limit for the glass furnace #2 day bins should be 37.4 lbs/hr. The *maximum potential* PM emissions from the glass furnace #1 day bin are only 7.3 lbs/hr without taking into consideration the 98% efficient control devices associated with these day bins (the PM emissions are only 0.15 lbs/hr when factoring in the control device efficiency). The *maximum potential* PM emissions from the glass furnace #2 day bins are only 8.6 lbs/hr without taking into consideration the 98% efficient control devices associated with these day bins (the PM emissions are only 0.17 lbs/hr when factoring in the control device efficiency). This means that these processes could comply with their respective applicable PM emission limitation as defined by 326 IAC 6-3 without the use of a control device. Since there is no possible way that the allowable PM emission limits can ever be exceeded for these processes, there is no need for a PMP to ensure that the associated control devices are working properly. In fact, this facility could decide to physically remove these control devices and still be in full compliance with all IDEM regulations. Therefore, we request that this PMP requirement be removed from the permit.

### Response #8

The OAM agrees that calculations show that the baghouses are not needed to comply with the applicable requirements. Therefore, the requirements to operate the baghouses, the requirement to have a PMP, and the compliance monitoring requirements for the baghouses have been removed from the permit.

### D.8.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

### **Compliance Determination Requirements**

### D.8.32 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limits specified in Condition D.8.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

### D.8.4 Baghouse [326 IAC 2-7-6(1)]

Visible Emissions Notations

The baghouses BH3 and BH4 shall be in operation at all times in order to comply with the limit in condition D.8.1.

Visible emission notations of the baghouses BH3 and BH4 stack exhausts shall be

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

		record whether emissions are normal or abnormal.			
	<del>(b)</del>	For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.			
	<del>(c)</del>	In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.			
	<del>(d)</del>	A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.			
	<del>(e)</del>	The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.			
D.8.6	Baghouse Inspections				
		pection shall be performed each calendar quarter of all bags controlling the glass Furnace as when venting to the atmosphere. All defective bags shall be replaced.			
D.8.7	<del>-</del> <del>- Broker</del>	n Bag or Failure Detection			
	event that bag failure has been observed:				
	(a)	The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated processes will be shut down immediately until the failed units have been repaired or replaced.			
	<del>(b)</del>	Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.			
D.8.8	Param	etric Monitoring			

The Permittee shall record the total static pressure drop across the baghouses BH3 and BH4

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used in conjunction with the glass Furnace day bins at least once daily when the glass Furnace day bins are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses BH3 and BH4 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.15 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

# D.8.9 Record Keeping Requirements (a) To document compliance with Conditions D.8.5 and D.8.8, the Permittee shall maintain records of daily visible emission notations of the glass Furnace day bins stack exhausts once per shift and of the pressure drop across the baghouses BH3 and BH4 once per day. (b) To document compliance with Condition D.8.6, the Permittee shall maintain records of the results of the inspections required under Condition D.8.6 and the dates the vents are redirected. (c) All records shall be maintained in accordance with Condition C.22 - General Record Keeping Requirements, of this permit.

### Comment #9

- <u>D.8.4</u> The requirement that the two baghouses (BH3 and BH4) on the glass furnace day bins be in operation at all times to comply with the 33.4 lbs/hr PM emission limitation is unnecessary and unjustified as described above for section D.8.2. Therefore, we request that this requirement be removed from the permit.
- <u>D.8.5</u> The requirement for VE notations on the glass furnace day bin baghouse exhaust stacks is also unjustified based upon the same arguments as given above for section D.1.5. Let us reiterate that these processes could operate without the associated control devices in operation and still be in full compliance with all applicable IDEM regulations. Therefore, we request that this monitoring requirement be deleted from the permit.
- $\underline{\text{D.8.6}}$  These requirements for the two baghouses controlling the glass furnace day bins are completely unnecessary and unjustified as described above for section D.8.5. Therefore, we request that these compliance monitoring requirements be deleted from the permit.

### Response #9

The OAM agrees that calculations show that the baghouses are not needed to comply with the applicable requirements. Therefore, the requirements to operate the baghouses, the requirement to have a PMP, and the compliance monitoring requirements for the baghouses have been removed from the permit.

### **Technical Support Document**

### Comment #10

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The emission spreadsheets in the TSD are incorrect in a few areas as described below:

Regenerative glass furnace #1 – The maximum potential controlled PM emissions are:

87.9 tons PM/yr x 2000 lb/ton x (1/8760) hrs/yr = 20.1 lbs PM/hr (will comply)

Regenerative glass furnace #2 – The maximum potential controlled PM emissions are:

71.2 tons PM/yr x 2000 lb/ton x (1/8760) hrs/yr = 16.3 lbs PM/hr (will comply)

Raw materials batch storage and conveying process – The maximum potential controlled PM emissions are:

69.4 tons PM/yr x 2000 lb/ton x (1/8760) hrs/yr = 15.9 lbs PM/hr (will comply)

Raw materials batch mixing process – The maximum potential controlled PM emissions are:

69.4 tons PM/yr x 2000 lb/ton x (1/8760) hrs/yr x (1 - 98%) = 0.32 lbs PM/hr (will comply)

Note: without the baghouse control efficiency the PM emissions are 15.9 lbs/hr (will comply)

Glass furnace #1 day bin – The maximum potential controlled PM emissions are:

31.8 tons PM/yr x 2000 lb/ton x (1/8760) hrs/yr x (1 – 98%) = 0.15 lbs PM/hr (will comply)

Note: without the baghouse control efficiency the PM emissions are 7.3 lbs/hr (will comply)

Glass furnace #2 day bins – The maximum potential controlled PM emissions are:

37.6 tons PM/yr x 2000 lb/ton x (1/8760) hrs/yr x (1 - 98%) = 0.17 lbs PM/hr (will comply)

Note: without the baghouse control efficiency the PM emissions are 8.6 lbs/hr (will comply)

### Response #10

The OAM agrees and has made all of these changes in Appendix A of the TSD.

### Comment #11

In summary, all of the compliance monitoring requirements listed in the draft Part 70 Significant Permit Modification for this facility are unjustified and completely unnecessary. It appears that IDEM has simply used a "cookbook" approach with this facility and has not taken into consideration the fact that these compliance monitoring requirements do not result in any increased environmental protection. Instead, they simply add an undue and unfair economic cost to the operation of this facility. All of the uncontrolled emission units at this facility are operating in compliance with all applicable IDEM regulations even considering the maximum operating scenario. All of the controlled emission units at this facility could operate in compliance with all applicable requirements even if the control devices were physically removed from operation. Therefore, we request that all compliance monitoring requirements listed in this draft permit be deleted from the final permit.

It seems that IDEM has relied heavily on the Compliance Monitoring *Guidance* document that was developed in May of 1996 when determining the applicable requirements for this facility. This guidance

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document has not been incorporated into the Indiana Administrative Code and seems to be much more stringent than the corresponding federal rules. This results in an unfair economic burden to Anchor Glass which makes it tough to compete in an extremely competitive industry. The Compliance Monitoring Guidance document attempts to place strict compliance monitoring requirements on emission units that have control devices with allowable PM emissions in excess of 10 lbs/hr. This facility has several emission units that have allowable PM emissions in excess of this threshold pursuant to 326 IAC 6-3. However, these same emission units have maximum potential PM emissions which are much less than the allowable PM emissions. This in effect means that these emission units have been assigned costly compliance monitoring requirements to ensure that the allowable PM emission thresholds are not exceeded, even though it is physically impossible to operate anywhere near the allowable PM emission levels. Similarly, this facility has several uncontrolled emission units with actual PM emissions that are near or less than the 25 tons/yr threshold. These emission units have unfairly been assigned strict compliance monitoring requirements as if they were significant sources of PM emissions.

It is our understanding that the Part 70 permit program only intends to summarize all applicable requirements for a facility in one operating permit document. The draft permit currently under review seems to have gone above and beyond the original intent of the Clean Air Act by adding strict compliance monitoring requirements that result in no tangible gain for the environment. It also appears that IDEM has provided an uneven playing field for Anchor Glass because the compliance monitoring requirements for the other major glass manufacturing facilities in Indiana are much less stringent.

### Response #11

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the Permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the Permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

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IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a Permittee's PMP might call for the Permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the Permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the Permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the Permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most Permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The Permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the Permittee may know from experience, what replacement parts should be kept on hand. The Permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the Permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The Permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the Permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be include in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most Permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the Permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A Permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the Permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance.

Upon further review, the OAM has made the following changes to the permit (deletions are shown with a strikeout, and additions are shown in bold):

- For clarification purposes, it must be noted that the Permittee is only given an additional 90 days
  to implement any **new** compliance monitoring reuqired by this modification. Any compliance
  monitoring which was already legally required by the Title V permit is still reuqired to be
  completed and the Permittee does not have an additional 90 days to initiate such required
  monitoring.
- C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, this schedule cannot be met, the Permittee may extend compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

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in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

# Indiana Department of Environmental Management Office of Air Management

# Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

### **Source Background and Description**

Source Name: Anchor Glass Container Corporation

Source Location: 603 East North Street, Winchester, Indiana 47394

County: Randolph SIC Code: 3221

Operation Permit No.: T 135-6042-00012
Operation Permit Issuance Date: June 24, 1999
Permit Modification No.: T 135-11351-00012
Permit Reviewer: Nisha Sizemore

The Office of Air Management (OAM) has reviewed a modification application from Anchor Glass Container Corporation relating to the operation of a glass container manufacturing facility.

### **History**

On September 17, 1999, Anchor Glass Container Corporation submitted an application to the OAM requesting changes to their compliance monitoring requirements. Anchor Glass Container Corporation was issued a Part 70 permit on June 24, 1999.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Stack Summary**

Emission units and stacks have been re-numbered. The new stack IDs are shown in the following table.

Stack ID	Operation
ST1	boiler #1
ST2	boiler #2
inside building	raw materials batch storage & conveying
ST9	raw materials batch mixer, controlled by baghouses BH1 and BH2
ST5	furnace #1 day bin controlled by baghouse BH3
ST6	furnace #2 day bin controlled by baghouse BH4
ST7	glass melt furnace #1
ST8	glass melt furnace #2

### Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 17, 1999.

### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations.

### **Modifications**

The following changes have been made at the source.

- (1) Dillon Boiler #3 has been decommissioned and thus is no longer operational. The list of emission units in Section A and Section D will be updated.
- (2) The boilers #1 and #2 are still operational, but no longer have the capability of burning any fuel other than natural gas. Therefore, the SO2 limits will be removed as well as the associated compliance monitoring and reporting requirements.
- (3) The two glass furnaces can no longer burn any fuel other than natural gas. Therefore, the SO2 limits pursuant to 326 IAC 7-1 will be removed as well as the associated compliance monitoring and reporting requirements pursuant to 326 IAC 7-2.
- (4) The raw materials batch storage and conveying process is not controlled by a baghouse. Emissions from these facilities exhaust inside the building. Therefore all baghouse compliance monitoring requirements will be removed. These units are not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) because they were constructed prior to 1977.
- (5) The raw materials batch mixing process is controlled by baghouse BH1 which vents to stack ST9 and baghouse BH2 which vents inside the building. This is simply clarification of the baghouse designation and the exhaust stack.
- (6) The glass furnace day bin #1 is controlled by baghouse BH3 which exhausts to stack ST5. This is simply clarification of the baghouse designation and the exhaust stack.
- (7) The glass furnace day bin #2 is controlled by baghouse BH4 which exhausts to stack ST6. This is simply clarification of the baghouse designation and the exhaust stack.

These changes necessitate the following permit modifications. Deletions are shown with a strikeout and additions are shown in bold.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) one (1) natural gas-**fired**, propane, or numbers 2, 4, or 6 fuel oil-fired glass Furnace, identified as Furnace #1, constructed in 1971, with a maximum design melt capacity of

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344 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST7;

- one (1) natural gas-fired, propane, or numbers 2, 4, or 6 fuel oil-fired glass Furnace, identified as Furnace #2, constructed in 1973, with a maximum design melt capacity of 448 tons of glass per day and a maximum qualified pull rate of 390 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST8;
- (3) one (1) natural gas-fired, kerosene, propane, diesel fuel, or numbers 2, 4, or 6 fuel oilfired Brownwell Boiler, constructed in 1908, identified as Boiler #1, rated at 100 hp, with a maximum heat input capacity of 10.5 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST1;
- (4) one (1) natural gas-fired, kerosene, propane, diesel fuel, or numbers 2, 4, or 6 fuel oilfired Buss Boiler, constructed in 1940, identified as Boiler #2, rated at 250 hp, with a maximum heat input capacity of 16.8 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST2;
- one (1) natural gas, kerosene, propane, diesel fuel, or numbers 2, 4, or 6 fuel oil-fired Dillon Boiler, constructed in 1948, identified as Boiler #3, rated at 350 hp, with a maximum heat input capacity of 16.8 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST3;
- (6)(5) one (1) raw materials batch storage and conveying process, constructed in 1929, with a maximum capacity of 1200 tons per day, with emissions uncontrolled and exhausting inside the building by baghouses ST4 and ST9;
- (7)(6) one (1) raw materials batch mixing process, constructed in 1929, with a maximum capacity of 1200 tons per day, with emissions controlled by baghouses **BH1 which** exhausts to stack ST4 and ST9 baghouse BH2 which exhausts inside the building;
- (8)(7) one (1) glass Furnace day bin, servicing Furnace #1, constructed in 1940, with a maximum capacity of 550 tons per day, controlled by a baghouse E.U2.3 BH3 and emissions exhausting to stack ST5; and
- (9)(8) one (1) glass Furnace day bin, servicing Furnace #2, constructed in 1991, with a maximum capacity of 650 tons per day, controlled by baghouse E.U2.4 BH4 and emissions exhausting to stack ST6.

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### **SECTION D.1**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) natural gas-**fired**, propane, or numbers 2, 4, or 6 fuel oil-fired glass Furnace, identified as Furnace #1, constructed in 1971, with a maximum design melt capacity of 344 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST7

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from the glass Furnace shall not exceed 27.2 pounds per hour.

This limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting numbers 2 or 4 fuel oil, the SO<sub>2</sub> emissions from the combustion of fuel oil in the Furnace shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the numbers 2 and 4 fuel oil shall not exceed 0.5 weight percent.
- (b) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting number 6 fuel oil, the SO<sub>2</sub> emissions from the combustion of fuel oil in the Furnace shall not exceed 1.6 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.4 weight percent.

### D.1.32 Arsenic [40 CFR Part 61.160, Subpart N)

Pursuant to 40 CFR Parts 61.160, Subpart N (National Emission Standards For Inorganic Arsenic Emissions From Glass Manufacturing Plants) arsenic shall not be used as a raw material in Furnace #1. Therefore, the requirements of this rule shall not apply.

### D.1.43 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

### **Compliance Determination Requirements**

### D.1.54 Testing Requirements [326 IAC 2-7-6(1),(6)]

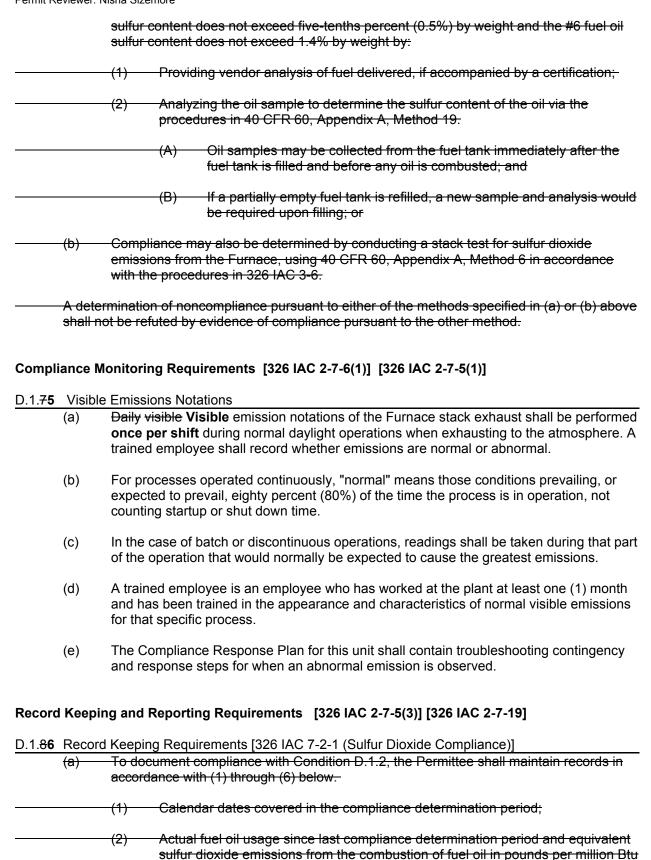
The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

### D.1.6 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the #2 and #4 fuel oil

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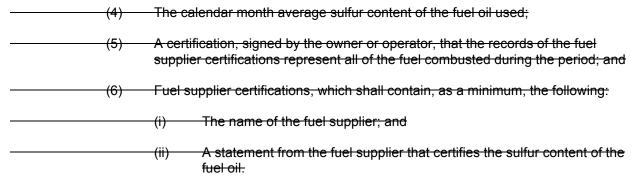


The calendar month average heat content of the fuel oil used;

of heat input;

 $\frac{(3)}{}$ 

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The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (ba) To document compliance with Condition D.1.7 D.1.5, the Permittee shall maintain records of daily visible emission notations of the Furnace stack exhaust once per shift.
- (eb) All records shall be maintained in accordance with Condition C.22 General Record Keeping Requirements, of this permit.

### D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 in any compliance period when fuel oil was combusted shall be submitted to the address listed in Condition C.23 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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### **SECTION D.2**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) natural gas-fired, propane, or numbers 2, 4, or 6 fuel oil-fired glass Furnace, identified as Furnace #2, constructed in 1973, with a maximum design melt capacity of 448 tons of glass per day and a maximum qualified melt capacity of 390 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST8

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.2.1 Particulate Matter (PM), Sulfur Dioxide (SO2), and Nitrogen Oxides (NOx) [326 IAC 2-2]

- (a) Pursuant to A 135-5897 issued on May 28, 1996, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable, the particulate matter emissions from the regenerative Furnace Number 2 shall not exceed 19.06 pounds per hour. This limit will also satisfy the requirements of 326 IAC 6-3-2 (Process Operations).
- (b) Pursuant to A 135-5897 issued on May 28, 1996, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable, the sulfur dioxide (SO<sub>2</sub>) emissions from the regenerative Furnace Number 2 shall not exceed 83.6 pounds per hour.
- (c) Pursuant to A 135-5897 issued on May 28, 1996, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable, the nitrogen oxide (NOx) emissions from the regenerative Furnace Number 2 shall not exceed 116.6 pounds per hour.
- (d) Pursuant to A 135-5897 issued on May 28, 1996, and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable, the pull rate of the Furnace Number 2 shall not exceed 390 tons per day.

These limits are necessary in order to render the requirements of PSD not applicable.

### D.2.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting numbers 2 or 4 fuel oil, the SO<sub>2</sub> emissions from the Furnace shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the numbers 2 and 4 fuel oil shall not exceed 0.5 weight percent.
- (b) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting number 6 fuel oil, the SO<sub>2</sub> emissions from the Furnace shall not exceed 1.6 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.4 weight percent.

### D.2.32 Arsenic [40 CFR Part 61.160, Subpart N)

Pursuant to 40 CFR Parts 61.160, Subpart N (National Emission Standards For Inorganic Arsenic Emissions From Glass Manufacturing Plants) arsenic shall not be used as a raw material in Furnace #2. Therefore, the requirements of this rule shall not apply.

### D.2.43 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

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### **Compliance Determination Requirements**

### D.2.54 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM,  $SO_2$ , and NOx testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.2.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

### Sulfur Dioxide Emissions and Sulfur Content Compliance shall be determined utilizing one of the following options. Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the #2 and #4 fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight and the #6 fuel oil sulfur content does not exceed 1.4% by weight by: Providing vendor analysis of fuel delivered, if accompanied by a certification; (2)Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19. Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the Furnace, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

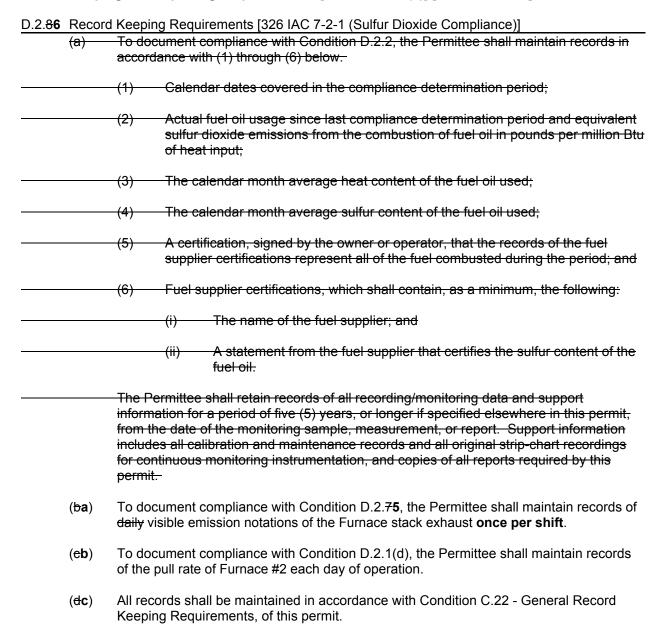
A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

### D.2.75 Visible Emissions Notations

- (a) Daily visible Visible emission notations of the Furnace stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]



### **D.2.3** Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 in any compliance period when fuel oil was combusted shall be submitted to the address listed in Condition C.23 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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### **SECTION D.3**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) natural gas-fired, kerosene, propane, diesel fuel, or numbers 2, 4, or 6 fuel oil-fired Brownwell Boiler, constructed in 1908, identified as Boiler #1, rated at 100 hp, with a maximum heat input capacity of 10.5 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST1

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.3.1 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting numbers 2 or 4 fuel oil, the SO<sub>2</sub> emissions from the Boiler #1 shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the numbers 2 and 4 fuel oil shall not exceed 0.5 weight percent.
- (b) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting number 6 fuel oil, the SO<sub>2</sub> emissions from the Boiler #1 shall not exceed 1.6 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.4 weight percent.

### D.3.21 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 10.5 MMBtu per hour heat input Boiler shall be limited to 0.8 pound per million Btu of heat input.

This limitation is based on the following equation:

Pt = 
$$\frac{\text{C X a X h}}{76.5 \text{ X Q}^{0.75} \text{ X N}^{0.25}}$$

- where C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.
  - Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).
  - Q = Total source maximum operating capacity rating in million Btu per hour of heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.
  - N = Number of stacks in fuel burning operation.
  - a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.
  - h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emissions rate.

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A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

### **Compliance Determination Requirements**

### D.3.42 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the SO<sub>2</sub> and PM limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

### Sulfur Dioxide Emissions and Sulfur Content Compliance shall be determined utilizing one of the following options. Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the #2 and #4 fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight and the #6 fuel oil sulfur content does not exceed 1.4% by weight by: (1)Providing vendor analysis of fuel oil delivered, if accompanied by a certification; Analyzing the oil sample to determine the sulfur content of the oil via the (2)procedures in 40 CFR 60, Appendix A, Method 19. Oil samples may be collected from the fuel oil tank immediately after the fuel oil tank is filled and before any oil is combusted; and <del>(B)</del> If a partially empty fuel oil tank is refilled, a new sample and analysis would be required upon filling; or Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the Boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

# D.3.6 Visible Emissions Notations (a) When combusting fuel oil, daily visible emission notations of the Boiler stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

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(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7	Recor	d Keeping Requirements [326 IAC 7-2-1 (Sulfur Dioxide Compliance)]			
	<del>(a)</del>	To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (6) below.			
		(1) Calendar dates covered in the compliance determination period;			
		(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions in pounds per million Btu of heat input;			
		(3) The calendar month average heat content of the fuel oil used;			
		(4) The calendar month average sulfur content of the fuel oil used;			
		(5) A certification, signed by the owner or operator, that the records of the fuel oil supplier certifications represent all of the fuel oil combusted during the period; and			
		(6) Fuel oil supplier certifications, which shall contain, as a minimum, the following:			
		(i) The name of the fuel oil supplier; and			
		(ii) A statement from the fuel oil supplier that certifies the sulfur content of the fuel oil.			
		The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.			
	<del>(b)</del>	To document compliance with Condition D.3.6, the Permittee shall maintain records of daily visible emission notations of the Boiler stack exhaust.			
	<del>(c)</del>	All records shall be maintained in accordance with Condition C.22 - General Record Keeping Requirements, of this permit.			
D.3.8	Repor	rting Requirements			
	A qua	rterly summary of the information to document compliance with Condition D.3.1 in any			

### SECTION D.4

the end of the quarter being reported.

compliance period when fuel oil was combusted and the natural gas Boiler certification, shall be submitted to the address listed in Condition C.23 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after

Facility Description [326 IAC 2-7-5(15)] one (1) natural gas-**fired**, kerosene, propane, diesel fuel, or numbers 2, 4, or 6 fuel oil-fired Buss Boiler, constructed in 1940, identified as Boiler #2, rated at 250 hp, with a maximum heat input capacity of 16.8 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST2

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.4.1 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7 1.1 1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting numbers 2 or 4 fuel oil, the SO<sub>2</sub> emissions from the Boiler #2 shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the numbers 2 and 4 fuel oil shall not exceed 0.5 weight percent.
- (b) Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting number 6 fuel oil, the SO<sub>2</sub> emissions from the Boiler #2 shall not exceed 1.6 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.4 weight percent.

### D.4.21 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 16.8 MMBtu per hour heat input Boiler shall be limited to 0.8 pound per million Btu of heat input.

This limitation is based on the following equation:

Pt = 
$$\frac{\text{C X a X h}}{76.5 \text{ X Q}^{0.75} \text{ X N}^{0.25}}$$

- where C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.
  - Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).
  - Q = Total source maximum operating capacity rating in million Btu per hour of heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.
  - N = Number of stacks in fuel burning operation.
  - a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.
  - h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emissions rate.

### D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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### **Compliance Determination Requirements**

### D.4.42 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the SO<sub>2</sub> and PM limits specified in Conditions

### D.4.1 and D.4.2 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing. Sulfur Dioxide Emissions and Sulfur Content Compliance shall be determined utilizing one of the following options. Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the #2 and #4 fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight and the #6 fuel oil sulfur content does not exceed 1.4% by weight by: Providing vendor analysis of fuel oil delivered, if accompanied by a certification; Analyzing the oil sample to determine the sulfur content of the oil via the (2)procedures in 40 CFR 60, Appendix A, Method 19. Oil samples may be collected from the fuel oil tank immediately after the fuel oil tank is filled and before any oil is combusted; and If a partially empty fuel oil tank is refilled, a new sample and analysis would be required upon filling; or Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the Boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6. A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method. Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] Visible Emissions Notations <del>When combusting fuel oil, daily visible emission notations of the Boiler stack exhaust</del> shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. <del>In the case of batch or discontinuous operations, readings shall be taken during that part</del>

The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

for that specific process.

of the operation that would normally be expected to cause the greatest emissions.

A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions

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### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7	.7 Record Keeping Requirements [326 IAC 7-2-1 (Sulfur Dioxide Compliance)]				
	<del>(a)</del>	To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (6) below.			
		(1) Calendar dates covered in the compliance determination period;			
		(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions in pounds per million Btu of heat input;			
		(3) The calendar month average heat content of the fuel oil used;			
		(4) The calendar month average sulfur content of the fuel oil used;			
		(5) A certification, signed by the owner or operator, that the records of the fuel oil supplier certifications represent all of the fuel combusted during the period; and			
		(6) Fuel supplier certifications, which shall contain, as a minimum, the following:			
		(i) The name of the fuel oil supplier; and			
		(ii) A statement from the fuel oil supplier that certifies the sulfur content of the fuel oil.			
		The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.			
	(b)	To document compliance with Condition D.4.6, the Permittee shall maintain records of daily visible emission notations of the Boiler stack exhaust.			
	<del>(c)</del>	All records shall be maintained in accordance with Condition C.22 - General Record Keeping Requirements, of this permit.			

### D.4.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 in any compliance period when fuel oil was combusted and the natural gas Boiler certification, shall be submitted to the address listed in Condition C.23 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

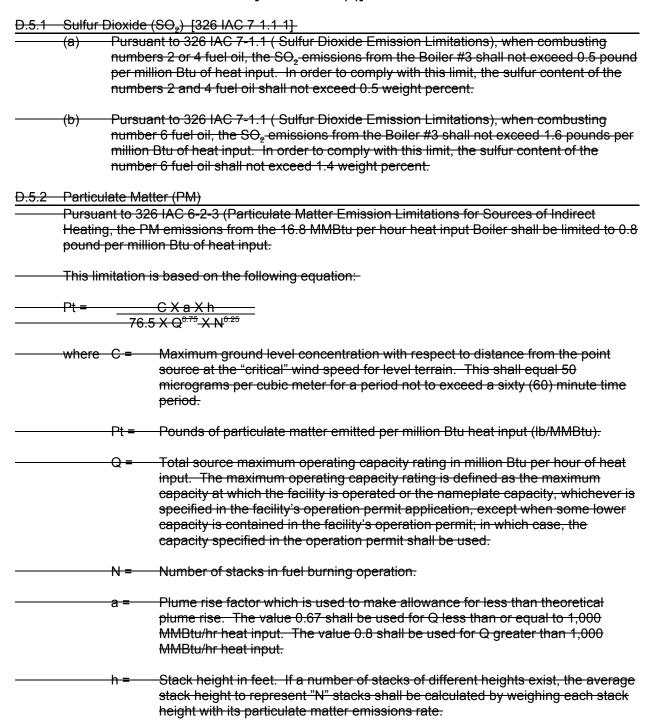
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### **SECTION D.5**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) natural gas, kerosene, propane, diesel fuel, or numbers 2, 4, or 6 fuel oil-fired Dillon Boiler, constructed in 1948, identified as Boiler #3, rated at 350 hp, with a maximum heat input capacity of 16.8 million British thermal units per hour, with no abatement equipment present and emissions exhausting to stack ST3

### Emission Limitations and Standards [326 IAC 2-7-5(1)]



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A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

### **Compliance Determination Requirements**

### D.5.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

<del>(B)</del>

the procedures in 326 IAC 3-6.

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the SO<sub>2</sub> and PM limits specified in Conditions D.5.1 and D.5.2 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

## D.5.5 Sulfur Dioxide Emissions and Sulfur Content Compliance shall be determined utilizing one of the following options. (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the #2 and #4 fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight and the #6 fuel oil sulfur content does not exceed 1.4% by weight by: (1) Providing vendor analysis of fuel oil delivered, if accompanied by a certification; (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19. (A) Oil samples may be collected from the fuel oil tank immediately after the fuel oil tank is filled and before any oil is combusted; and

would be required upon filling; or

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the Boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with

If a partially empty fuel oil tank is refilled, a new sample and analysis

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

# D.5.6 Visible Emissions Notations (a) When combusting fuel oil, daily visible emission notations of the Boiler stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

Anchor Glass Container Corporation Winchester, Indiana Permit Reviewer: Nisha Sizemore First Significant Permit Modification 135-11351 Modified by: Nisha Sizemore Page 18 of 30 OP No. T135-6042-00012

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.7	Record	Heeping Requirements [326 IAC 7-2-1 (Sulfur Dioxide Compliance)]			
	<del>(a)</del>	To document compliance with Condition D.5.1, the Permittee shall maintain records in accordance with (1) through (6) below.			
		(1) Calendar dates covered in the compliance determination period;			
		(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions in pounds per million Btu of heat input;			
		(3) The calendar month average heat content of the fuel oil used;			
		(4) The calendar month average sulfur content of the fuel oil used;			
		(5) A certification, signed by the owner or operator, that the records of the fuel oil supplier certifications represent all of the fuel combusted during the period; and			
		(6) Fuel oil supplier certifications, which shall contain, as a minimum, the following:			
		(i) The name of the fuel oil supplier; and			
		(ii) A statement from the fuel oil supplier that certifies the sulfur content of the fuel oil.			
		The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.			
	<del>(b)</del>	To document compliance with Condition D.5.6, the Permittee shall maintain records of daily visible emission notations of the Boiler stack exhaust.			
	<del>(c)</del>	All records shall be maintained in accordance with Condition C.22 - General Record Keeping Requirements, of this permit.			

### D.5.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 in any compliance period when fuel oil was combusted and the natural gas Boiler certification, shall be submitted to the address listed in Condition C.23 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the guarter being reported.

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### **SECTION D.6**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) raw materials batch storage and conveying process, constructed in 1929, with a maximum capacity of 1200 tons per day, with emissions **un**controlled <del>by baghouses ST4 and ST9</del> **and exhausting inside the building** 

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.6.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from the raw materials batch storage and conveying process shall not exceed 44.6 pounds per hour when operating at the maximum capacity of 50 tons per hour.

This limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight greater than sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 55 (P^{0.11}) - 40$ 

where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

### D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

### **Compliance Determination Requirements**

### D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

### D.6.4 Baghouse [326 IAC 2-7-6(1)]

The baghouses ST4 and ST9 shall be in operation at all times in order to comply with the limit in condition D.6.1.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

### Daily visible emission notations of the baghouses ST4 and ST9 stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

A trained employee is an employee who has worked at the plant at least one (1) month

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and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### D.6.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the raw materials batch storage and conveying process when venting to the atmosphere. All defective bags shall be replaced.

### D.6.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated processes will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

### D.6.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses ST4 and ST9 used in conjunction with the raw materials batch storage and conveying process, at least once daily when the raw materials batch storage and conveying process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST4 and ST9 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.15 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

### D.6.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.6.5 and D.6.8, the Permittee shall maintain records of daily visible emission notations of the raw materials batch storage and conveying process stack exhaust and of the total static pressure drop across the baghouses ST4 and ST9.
- (b) To document compliance with Condition D.6.6, the Permittee shall maintain records of the results of the inspections required under Condition D.6.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Condition C.22 General Record Keeping Requirements, of this permit.

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### **SECTION D.7**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] one (1) raw materials batch mixing process, constructed in 1929, with a maximum capacity of 1200 tons per day, with emissions controlled by baghouses **BH1** which exhausts to stack ST4 and <del>ST9</del> baghouse **BH2** which exhausts inside the building;

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.7.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from the raw materials batch mixing process shall not exceed 44.6 pounds per hour when operating at the maximum capacity of 50 tons per hour.

This limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight greater than sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 55 (P^{0.11}) - 40$ 

where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

### D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

### **Compliance Determination Requirements**

### D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

### D.7.4 Baghouse [326 IAC 2-7-6(1)]

The baghouses ST4 and ST9 BH1 and BH2 shall be in operation at all times in order to comply with the limit in condition D.7.1.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

### D.7.5 Visible Emissions Notations

- (a) Daily visible Visible emission notations of the baghouses ST4 and ST9 BH1 and BH2 stack exhausts shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month

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and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### D.7.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the raw materials batch mixing process when venting to the atmosphere. All defective bags shall be replaced.

### D.7.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated processes will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

### D.7.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses ST4 and ST9 BH1 and BH2 used in conjunction with the raw materials batch mixing process, at least once daily when the raw materials batch mixing process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST4 and ST9 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.10 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

### D.7.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.7.5 and D.7.8, the Permittee shall maintain records of daily visible emission notations of the raw materials batch mixing process stack exhaust and of the pressure drop across the baghouses ST4 and ST9 BH1 and BH2.
- (b) To document compliance with Condition D.7.6, the Permittee shall maintain records of the results of the inspections required under Condition D.7.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Condition C.22 General Record Keeping Requirements, of this permit.

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### **SECTION D.8**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]

one (1) glass Furnace day bin, servicing Furnace #1, constructed in 1940, with a maximum capacity of 550 tons per day, controlled by a baghouse E.U2.3 BH3 and emissions exhausting to stack ST5; and

one (1) glass Furnace day bin, servicing Furnace #2, constructed in 1991, with a maximum capacity of 650 tons per day, controlled by baghouse E.U2.4 BH4 and emissions exhausting to stack ST6.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.8.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from each of the glass Furnace day bins shall not exceed 33.4 pounds per hour when operating at the maximum capacity of 22.9 tons per hour.

This limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

### D.8.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

### **Compliance Determination Requirements**

### D.8.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limits specified in Condition D.8.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

### D.8.4 Baghouse [326 IAC 2-7-6(1)]

The baghouses ST5 and ST6 BH3 and BH4 shall be in operation at all times in order to comply with the limit in condition D.8.1.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

### D.8.5 Visible Emissions Notations

- (a) Daily visible Visible emission notations of the baghouses ST5 and ST6 BH3 and BH4 stack exhausts shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

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- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### D.8.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the glass Furnace day bins when venting to the atmosphere. All defective bags shall be replaced.

### D.8.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated processes will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

### D.8.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses ST5 and ST6 BH3 and BH4 used in conjunction with the glass Furnace day bins at least once daily when the glass Furnace day bins are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST5 and ST6 BH3 and BH4 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.15 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

### D.8.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.8.5 and D.8.8, the Permittee shall maintain records of daily visible emission notations of the glass Furnace day bins stack exhausts once per shift and of the pressure drop across the baghouses ST5 and ST6 BH3 and BH4 once per day.
- (b) To document compliance with Condition D.8.6, the Permittee shall maintain records of the results of the inspections required under Condition D.8.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Condition C.22 General Record Keeping Requirements, of this permit.

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### **SECTION D.13**

### **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)] four (4) parts washers used for maintenance purposes which were constructed after January 1, 1980.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.13.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

### D.13.2 Hazardous Air Pollutants (HAPs)

Pursuant to the 40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning, Subpart T, the solvent used in the parts washers shall not contain any of the following halogenated solvents in concentrations greater than five percent by weight: methylene chloride, 1,1,1-trichloroethane, trichloroethylene, perchloroethylene, carbon tetrachloride, or chloroform.

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### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

### PART 70 OPERATING PERMIT NATURAL GAS FIRED Boiler CERTIFICATION

Mailing Address: 6	03 East North Street, W 135-6042-00012	/inchester, Indiana 47394 /inchester, Indiana 47394								
	135-6042-00012	,	<del>I-0406</del>							
Part 70 Permit No.:										
	included when submit									
This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.										
Report period										
Beginning:										
Ending:										
Boiler Affected	Alternate Fuel	Days burning alternate								
		<u>From</u>	<del>To</del>							
I certify that, based on informa information in the document are			, the statements and							
<del>Signature:</del>										
Printed Name:										
Title/Position:										
<del>Date:</del>										

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The following comments were made along with the request for modifications. An explanation is provided below for any changes requested which were denied.

### Comment #1

Boilers #1 and #2 will never be operated at the same time. Therefore, the maximum heat input capacity for both boilers should be equal to the maximum heat input capacity of the largest boiler.

### Response #1

The OAM does not agree. Even though both boilers will never be operated at the same time, each boiler still maintains its own maximum heat input capacity. Rule applicability for each boiler is determined by the potential to emit from each boiler based on its own maximum heat input capacity. There is no federally enforceable limit that requires only one boiler to be operational at a time.

### Comment #2

The requirements to perform visible emission notations on the furnaces #1 and #2 should be deleted now that the furnaces cannot combust any fuel other than natural gas.

### Response #2

The visible emission notations are still required in order to show compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 5-1 (Opacity Limitations). The source has also accepted a particulate matter limit on furnace #2 such that the requirements of 326 IAC 2-2 (PSD) will not apply. Particulate emissions from a glass furnace are generated from the melting of the raw materials, not just from the combustion of fuel. Therefore, the requirement to perform visible emission notations is still applicable, even though the furnaces only combust natural gas.

### Comment #3

The control devices for the raw materials batch mixing process and the glass furnace day bins are not required in order to comply with the limit pursuant to 326 IAC 6-3-2 (Process Operations); therefore all compliance monitoring requirements and preventive maintenance plans (PMPs) for these control devices should be deleted from the permit.

### Response #3

The OAM disagrees. According to OAM's compliance monitoring guidance, these units have applicable compliance monitoring requirements because the units emit particulate matter, have control devices, and have allowable emissions above 10 pounds per hour. Therefore, the compliance monitoring requirements and the requirements to have PMPs for these units have not been deleted from the permit.

### Comment #4

Which parts washers are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations)?

### Response #4

All parts washers constructed after the applicability date of January 1, 1980 are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations).

### Conclusion

The operation of this glass container manufacturing operation shall be subject to the conditions of the attached proposed Part 70 Permit Modification No. 135-11351-00012.

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